

**IN THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**IN RE C.R. BARD, INC., MDL NO. 2187
PELVIC REPAIR SYSTEM PRODUCTS
LIABILITY LITIGATION**

**IN RE AMERICAN MEDICAL SYSTEMS, MDL NO. 2325
PELVIC REPAIR SYSTEM PRODUCTS
LIABILITY LITIGATION**

**IN RE BOSTON SCIENTIFIC CORP., MDL NO. 2326
PELVIC REPAIR SYSTEM PRODUCTS
LIABILITY LITIGATION**

**IN RE ETHICON, INC., MDL NO. 2327
PELVIC REPAIR SYSTEM PRODUCTS
LIABILITY LITIGATION**

**IN RE COLOPLAST CORP., MDL NO. 2387
PELVIC REPAIR SYSTEM PRODUCTS
LIABILITY LITIGATION**

**IN RE COOK MEDICAL, INC., MDL NO. 2440
PELVIC REPAIR SYSTEM PRODUCTS
LIABILITY LITIGATION**

**IN RE NEOMEDIC, INC., MDL NO. 2511
PELVIC REPAIR SYSTEM PRODUCTS
LIABILITY LITIGATION**

THIS DOCUMENT RELATES TO ALL CASES

MOTION FOR SUBSTITUTION AND WITHDRAWAL OF COUNSEL

TO THE HONORABLE JUDGE OF THIS COURT:

PLEASE TAKE NOTICE that Fleming, Nolen & Jez, (“FNJ”), by and through its undersigned counsel, respectfully moved this Court for entry of an order withdrawing **Karen Beyea-Schroeder**, the current counsel for clients in the above referenced matter, and

substituting Karen Beyea-Schroeder with Attorneys Rand P. Nolen and G. Sean Jez as Counsel in MDL Nos. 2187, 2325, 2326, 2327, 2387, 2440 and 2511 in the main MDL and for every member case associated with these MDLs.

Accordingly, FNJ respectfully requests that the Court enter an order withdrawing Karen Beyea-Schroeder as counsel and substituting Rand P. Nolen and G. Sean Jez as Counsel, as well as updating each member case in which any of the named attorneys have been associated in MDL Nos. 2187, 2325, 2326, 2327, 2387, 2440 and 2511 in the main MDL and for every member case associated with these MDLs.

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CERTIFICATE OF SERVICE

I hereby certify that on February 19, 2016 I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day to all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or by mailing the same to the offices of said counsel by United States mail, postage prepaid.

Respectfully submitted,

FLEMING NOLEN & JEZ, L.L.P.

/s/Karen Beyea-Schroeder

Karen Beyea-Schroeder